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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF MOTION FOR
CONTINUANCE OF TRIAL DATE**

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal (“Waymo’s Administrative Motion”) confidential information in its Reply in Support of Motion
 8 for Continuance of Trial Date. Waymo’s Administrative Motion seeks an order sealing the following
 9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply in Support of Motion for Continuance of Trial Date (“Waymo’s Reply”)	Highlighted portions	Defendants (blue); Anthony Levandowski (yellow)
Declaration of David Perlson in Response to Court Order	Highlighted portions	Anthony Levandowski (yellow)
Exhibit 2 to Perlson Declaration	Entire document	Defendants and/or Anthony Levandowski
Exhibit 5 to Perlson Declaration	Entire document	Defendants and/or Anthony Levandowski

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 18 3. Waymo’s Reply and exhibits contain information that Defendants and/or non-party Mr.
 19 Levandowski and/or other third-parties have designated as confidential and/or highly confidential.

20 4. Waymo takes no position on the merits of sealing the designated material, and expects
 21 Defendants and/or Mr. Levandowski and/or other third-parties to file one or more declarations in
 22 accordance with the Local Rules.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
 24 true and correct, and that this declaration was executed in San Francisco, California, on September 19,
 25 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
 28 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven
Charles K. Verhoeven